

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )  
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Interconnection and Resale )  
Obligations Pertaining to ) CC Docket No. 94-54  
Commercial Mobile Radio )  
Services )

Comments of General Communication, Inc.

Pursuant to Section 1.415 of the Commission's rules, General Communication, Inc. (GCI) hereby comments on the Commission's Second Notice of Proposed Rulemaking (Notice).<sup>1</sup> The Notice has been issued in response to comments received by the Commission to its Notice of Inquiry (Inquiry).<sup>2</sup> GCI Communication Corp. (GCICC), a wholly owned subsidiary of GCI, will soon be a PCS provider since it is the high bidder on the Alaska Block B MTA.

**Introduction**

The Commission seeks comment on interconnection, roaming and resale obligations between commercial mobile radio service (CMRS) providers. The Commission tentatively concludes that it would be premature to propose or adopt specific rules requiring direct interconnection arrangements between CMRS providers. The Commission states that it cannot determine the technical nature

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<sup>1</sup>Second Notice of Proposed Rulemaking, FCC 95-149, released April 20, 1995.

<sup>2</sup>Equal Access and Interconnection Obligations Pertaining to Commercial Mobile Radio Service, 9 FCC Rcd 5408 (1994).

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of CMRS to CMRS interconnection, the costs of interconnection or the nature of the rules that would best insure implementation. However, the Commission proposes to adopt broad policy guidelines. The Commission tentatively concludes that imposing a resale obligation on most CMRS providers will be in the public interest.

### **Interconnection Between CMRS Providers**

In the Notice, the Commission states "that the interconnectivity of mobile communications networks promotes the public interest because it enhances access to all networks, provides valuable network redundancy, allows for greater flexibility, and makes communications services more attractive to consumers."<sup>3</sup> However, the Commission argues that it is premature to impose a general obligation on all CMRS providers. The Commission reasons that no one knows what CMRS networks will look like, so the Commission cannot determine what points of interconnection would be the most efficient.

CMRS providers are common carriers and therefore are required to interconnect with any common carrier requesting such interconnection<sup>4</sup>. The Commission must adopt a policy that requires interconnection between CMRS providers upon a bona fide request. GCI agrees that the Commission cannot state exactly where the point of interconnection should occur and what specific

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<sup>3</sup>Second Notice of Proposed Rulemaking, page 16.

<sup>4</sup>There should not be any difference between rural and non-rural areas. See, Reply Comments of GCI, CC Docket 94-54, dated October 22, 1994.

functions and features should be available. However, any CMRS provider that so requests should be allowed to receive the highest form of interconnection possible in the network. All providers must ensure that features and functions of the network are portable so that consumers can receive various services and functionalities between networks. These services include CLASS services,<sup>5</sup> calling cards and SS7 capabilities. Feature portability must not be lost between networks and must be transparent to users.

The wireline incumbent local exchange carrier (LEC) will be required to interconnect with all CMRS providers. Therefore, CMRS providers will only seek interconnection between themselves if it is economic. However, the Commission must be ready to handle any complaints regarding CMRS to CMRS interconnection issues on an expedited basis. The Commission must clearly state that all CMRS providers must interconnect upon request. This will ensure that CMRS networks will be constructed in such a manner that will encourage interconnection. If that signal is not clearly delineated, providers will not build their networks accordingly. The cellular companies currently operating should be given a time frame from which a bona fide request is made for interconnection to upgrade their network as necessary. Six months from the date of the bona fide request appears to be appropriate.

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<sup>5</sup>Rules and Policies Regarding Caller ID, FCC 95-187, released May 5, 1995.

Interconnection between providers should include all the other items necessary to ensure a competitive market. These include number portability, unbundling of network functions and services, access to databases and signalling, and mutual compensation. Without these capabilities, competition and full service offerings to users cannot be assured.

There is another class of traffic called transiting traffic that should be addressed by the Commission. Transit traffic occurs when a company neither originates the call nor terminates the call, but carries the call over its network for a portion of the route. For example, company A interconnects with company B and company C interconnects with company B, but companies A and C do not interconnect with each other. Company B is a transiting carrier. In this situation, company B is not a bottleneck because companies A and C can interconnect with each other if they so choose or purchase transiting service from another carrier.<sup>6</sup> This happens in the interexchange industry today. For example, GCI hands off calls to an interexchange carrier with facilities in the lower 48 to complete calls in some regions of the lower 48. Further, many lower 48 interexchange carriers need an Alaska facilities based carrier to complete calls to Alaska. This is prevalent for other regional interexchange carriers. The

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<sup>6</sup>The only exception to this rule is in the Alaska bush. Alascom has a facilities monopoly in the Alaska bush. The rates for carriers needing to complete calls to the Alaska bush will be tariffed pursuant to Commission Order. These rates should be tariffed since by policy there is only one provider, Alascom, that is allowed to build in the Alaska bush. Integration of Rates and Services, FCC 94-116, released May 24, 1994.

transiting charges between those carriers should be determined through a negotiated process between those carriers.

#### **Roaming**

Roaming must be mandated. The Commission must take the necessary steps to ensure that roaming works for all providers and their customers. GCI looks forward to the responses from the cellular carriers and equipment vendors to the questions posed by the Commission on roaming. Any development of standards by the industry must allow participation from all providers, including potential providers. All roaming issues must be quickly resolved.

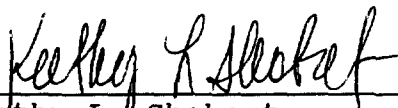
#### **Resale**

GCI supports the extension of the Commission's basic resale policy to all CMRS providers. There should be no unreasonable restriction on the resale of such services. All tariffs and contracts offered by a carrier should be available to anyone including resellers.

### Conclusion

The Commission should mandate an interconnection policy between CMRS providers upon request. Interconnection should include unbundling, number portability, access to databases and signalling and mutual compensation. Roaming and resale must also be mandated.

Respectfully submitted,  
General Communication, Inc.

  
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June 14, 1995

**STATEMENT OF VERIFICATION**

I have read the foregoing and to the best of my knowledge, information and belief there is good ground to support it and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed June 14, 1995.

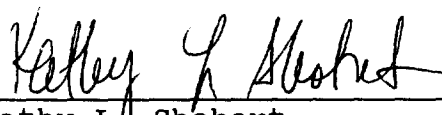


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**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of June 1995, the foregoing was mailed postage prepaid to the parties listed below.

  
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